

Paul Delluniversita
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07/25/2019

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Docket #18-cv-1600 (MKB) (JO)

Dear Honorable District Judge Brodie, and Honorable Magistrate Judge Orenstein

I am writing this letter to graciously ask the court to please allow myself, Paul Delluniversita, and my parents Gail and Anthony Delluniversita, at least another thirty days to obtain new counsel. Although we do respect and will abide by any decision made by the court, we're finding it quite hard, if not impossible to obtain new counsel in this short time period. We may have misunderstood the time frame of our attorney being dismissed. We were under the assumption that my brother, Anthony Delluniversita, would be allowed to represent us through discovery and depositions and until the start of trial. Admittedly being wrong, we're now in a position where we may have to proceed without proper counsel protecting our interests. Also, my father has had three strokes since May, that to this day have him in a hospital bed unable to walk, talk and swallow. Most of the lawyers we've interviewed need information from him to properly understand the case and fairly defend us.

We have been trying to obtain new counsel since early May. We've spoken to David Barry of Collins Gann Mcloskey Barry pllc of Garden City , NY, and Blanch Law firm in Manhattan. Both were unable to work with the short time period and lack of information from my father. We are currently in contact with Michael Cardello of Moritts Hock in Garden City, Ny, but he and any other attorney would need at least thirty days to properly catch up on the case.

Another issue we are having is the giant retainer any lawyer I've spoken to requires. I understand the seriousness and complexity of the case, but we are simply having trouble trying to put put the money together. We are trying our hardest, and I am confident that we can figure it out.

I have personally reached out to attorney Kenneth Walsh, since I am pro say currently, and asked him to agree with a thirty day extension. After ten minutes of financial threats from Mr. Walsh, he reluctantly agreed to fifteen days of extension, which still isn't enough.

In closing, we do believe in the court and respect all past and future decisions made, and hope you can allow us another thirty days for our potential attorney, Michael Cardello of Moritts Hock, to catch up and prepare. As you know, there are a lot of documents to understand. Thank you for taking the time to read this letter and for considering the matter, it is also very important to us.

Sincerely,
Paul Delluniversita

Paul Delluniversita

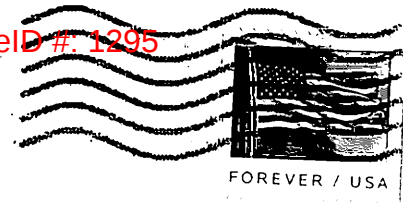
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